November 29, 2005

The Honorable Norman Mineta Secretary of Transportation United States of America Washington, DC

Re: Comments on Proposed Time Zone Boundary in the State of Indiana Docket No. 2005-22114

Dear Mr. Secretary:

The process of reforming and modernizing Indiana's uniquely confusing pattern of time zones has now reached its final step. The fundamental action, joining the rest of the nation on Daylight Saving Time, means that from now on:

- 1. Indiana will no longer be the only state divided into three time zones, but will join the ten states that have two;
- 2. Hoosiers will never again have to ask themselves "What month is this?" to know whether another Indiana community is on the same time or one hour different than their own; and
- 3. Our customers and other business partners in other parts of the U.S. and the world will never again be frustrated and confused because a given Indiana location is a different number of hours away depending what time of year it is.

In the wake of this overdue change, the vast majority of Indiana counties have expressed satisfaction with their current time zone assignment but, as you know, seventeen counties have asked for reassignment from the Eastern to the Central Zone. In my view, the one issue appropriate for statewide decision was the move to DST, which was a burden on our whole state's economy and the cause of the intrastate confusion mentioned above. Choice between time zones, however, is clearly a matter in which local preference should come first – that is why federal guidelines invite any county in America to petition for a change any time it wishes – subject to the convenience of commerce and the need to keep regions together or avoid any kind of non-contiguous, "patchwork" pattern. Therefore, I support these county petitions, except in cases where county preference conflicts with the overriding need to keep an economic and social region intact.

I believe your proposed rule keeps regions intact, except in two cases.

First, I recommend that the Department decline the petition of St. Joseph County to move from the Eastern to the Central Zone. The clear preference of neighboring Elkhart County and other nearby counties to remain in the Eastern Zone means that a unified metropolitan region would be divided, an outcome that virtually no one advocates.

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Beyond the need to keep this region together, I must note that the facts seem clearly adverse to the St. Joseph request. By a 9:1 margin, citizens of St. Joseph County commute to counties that want to remain Eastern time versus counties that are now Central time. By a 4:1 margin, workers commuting into St. Joseph County come from the Eastern versus Central Time Zone. Not surprisingly, what evidence we have indicates that public opinion within St. Joseph County, if it favors a change at all, is closely divided.

Second, in Southwest Indiana your proposed rule would divide a multi-county region that, through your public hearing process, has expressed a clear argument and desire to be placed together on Central Time. The Department's proposal correctly added three counties (Perry, Knox and Pike) to the five existing Central Time Zone counties in Southwest Indiana. However, to fully preserve the unity of this natural region it is essential that you grant the petitions of the three remaining counties in this corner of the state (Daviess, Dubois and Martin).

Approval of the above recommendations would produce one further, modest improvement in Indiana's time arrangements. The number of Hoosiers on the same time with each other all year round would increase by 100,000, to more than 5,000,000 – a little over 80%. Obviously, one time zone statewide would be ideal, but this goal has proven unattainable. Our Northwest and Southwest corners are tightly tied to adjacent Central Zone areas in other states, and cannot reasonably be asked to move to Eastern Time. Meanwhile, the vast majority of Indiana communities have no interest in moving to the Central Zone. They cannot and should not be coerced into doing so.

Indiana's final request, one on which I am sure all our citizens can agree, is that the Department decide swiftly now that all voices have had their chance to be heard. Please act promptly so that our state can enter the New Year with certainty that our decades of chaos are behind us and that, while short of perfect, a new era of clarity and simplicity has begun.

Sincerely.

Mitchell E. Daniels, Jr.

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